

Shorter, Chere

From: Blomquist@spectrumorganic.com%inter2 [Blomquist@spectrumorganic.com] on behalf of Blomquist@spectrumorganic.com
Sent: Tuesday, November 09, 2004 9:07 PM
To: Shorter, Chere
Subject: New Olive Oil Standards - Comments

TO: Chere L. Shorter, Standardization Section
 Agricultural Marketing Service
 USDA

FROM: Neil Blomquist, President and CEO
 Spectrum Organic Products, Inc.
 5341 Old Redwood Highway, Suite 400
 Petaluma, CA 94954
 Tel 707-778-8900
neilb@spectrumorganic.com
www.spectrumorganic.com

RE: Comments on Petition to Change US Standards for Grades of Olive Oil

This initiative is of vital importance to the olive oil industry and to the American consumers. Growth in the consumption of olive oil among US consumers continues at a brisk pace as our country embraces the value of the Mediterranean Diet, the interest in ethnic cuisine and cooking, as well as the growing concerns around health and diet, especially related to fats. The current standards are outdated and fail to address the wide range of olive oil quality, provenance and processing issues that dramatically affect what is being sold to the consumer. As a consequence, marketers have taken extreme liberties in packaging and labeling of their products. Consider the following examples:

- Italy exports to the US far more olive oil than it produces, using oil from other countries to blend and sell as "Italian", taking advantage of the consumer perception that Italy produces the best olive oil.
- Much of the low cost olive oil labeled as "Extra Virgin" in the US, does not meet European standards for this level of quality, thus taking advantage of the fact that there is no standard for extra virgin in the US. These products can contain refined olive oil that is clearly of inferior quality without breaking any US packaging laws. Consumers have learned to seek out Extra Virgin, based on the superior quality that this grade of olive oil is supposed to represent, and they are buying a product that is legally of inferior quality in most of the rest of the world.
- For those marketers of olive oil that source or produce olive oil that meets the standards as set out by the well established International Olive Oil Council (IOOC), the ability to effectively communicate this higher quality and market their product at a price that is representative of the true cost of producing Extra Virgin olive oil, are put at an extreme market disadvantage.

The European Market has a long history of producing and marketing olive oil, and as a consequence, they have a well established set of standards for the various grades of olive oil, as well as labeling guidelines that provide a fair and even playing field for marketers and protection for consumers. The IOOC governing body, located in Madrid, Spain, is recognized throughout the world as the authority on olive oil. By simply enacting USDA standards that embrace these long established and proven guidelines, the US market will be rid of the confusion that currently existing among consumers, create a true value model for the various grades of olive oil that protect the interests of consumers, and eliminates what has become a US dumping ground for low quality olive oil sold as something that it is not.

Sincerely,
 Neil Blomquist

11/10/2004